

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

Case No. 19–cr–20425

HON. BERNARD A. FRIEDMAN

Mario Keeream Jackson,

Defendant.

Defendant’s Proposed Jury Instruction about Law Enforcement Credibility

Defendant moves this Honorable Court to give an added instruction to the jury about the credibility of law enforcement witnesses to be added within the Sixth Circuit Pattern Criminal Jury Instruction 1.07 Credibility of Witnesses.

“The testimony of a law enforcement officer is entitled to no greater weight than that of other witnesses simply because he or she is a law enforcement officer.”

That proposed instruction comes from *United States v. Daniels*, 396 F. App'x 257, 259 (6th Cir. 2010). In *Daniels*, the government and the defendant agreed to using that instruction. *Id.* The Sixth Circuit noted that the proposed instruction was a correct statement of law; however, “the district court did not commit reversible error by failing to give the instruction because other delivered instructions addressed credibility of witnesses.” *Id.*

Dated: May 15, 2023

Respectfully submitted,

By: /s/Mark H. Magidson

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